

**TROY GERMAN,  
PLAINTIFF, V. BRIAN  
ORR, DEFENDANT  
WDOK 19-CV-751-F  
MOTION EXHIBITS FOR  
DEFENDANT ORR'S  
MOTION FOR SUMMARY  
JUDGMENT  
  
EXHIBIT 6 – DEPOSITION  
OF KEATING**

1           IN THE UNITED STATES DISTRICT COURT  
2           FOR THE WESTERN DISTRICT OF OKLAHOMA  
3   TROY D. GERMAN,                    )  
4       Plaintiff,                    )  
5   -vs-                                ) No. CIV-19-751-F  
6   BILLY D. "RUSTY" RHOADES,        )  
7   individually; MICHAEL HARRELL,    )  
8   individually; BRIAN ORR,           )  
9   individually; and MEGAN SIMPSON,)  
10       Defendants.                    )  
11                                        )  
12                                        )

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13           DEPOSITION OF ANTHONY FRANCIS "CHIP" KEATING, III

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15           TAKEN ON BEHALF OF THE PLAINTIFF

16

17           IN OKLAHOMA CITY, OKLAHOMA

18

19           ON SEPTEMBER 3, 2020

20

21           COMMENCING AT 9:33 A.M.

22

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24           INSTAScript, LLC.  
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REPORTED BY: LORI JOHNSTON HARSTAD, CSR, RPR, RSA

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1                   A P P E A R A N C E S

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36       ALSO PRESENT:

37               Troy German

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I N D E X

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Anthony Francis "Chip" Keating, III:

Direct Examination by MR. BOWERS	5:5
Cross-Examination by MR. GASKINS	76:22
Cross-Examination by MR. YAFFE	79:14
Redirect Examination by MR. BOWERS	86:22
Recross-Examination by MR. YAFFE	87:14

EXHIBITS

None

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1 that were filed against Troy German?

2 A Yes.

3 Q Who have you spoken to?

4 MR. CRAWFORD: You can answer that.

5 THE WITNESS: The Attorney General himself.

6 Q (By Mr. Bowers) When was that conversation?

7 A Immediately following the meeting with  
8 Mr. Rhoades.

9 Q And what did you say to Mr. Hunter and what did  
10 he say to you?

11 A I asked General Hunter, I said, "General, I  
12 just finished a meeting with Rusty, and I am just -- I am  
13 confused. Rusty doesn't know why your office declined to  
14 move forward in the trial."

15 And Mr. Hunter interrupted me and laughed and  
16 said, "That is, quote, bullshit." And he said, "They  
17 called over here and asked that we drop this case  
18 immediately at the department's request and that, in  
19 return, they had negotiated a separation with Mr. German's  
20 employment."

21 Q Did he say who had called over there?

22 A Did not.

23 Q Did you -- did you ask him who it was?

24 A I did not.

25 Q Did you get the impression he meant Rusty

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1 Q Tell me about those discussions.

2 A I asked Rusty that directly.

3 Q What did you ask him?

4 A It was in that meeting before I called General  
5 Hunter. And I asked him, "I hope we have a hold harmless.  
6 If we're negotiating a peaceful settlement, we need a hold  
7 harmless."

8 And he said, "I made sure the AG's office knew  
9 about that, but they said we're not going to do that,"  
10 which made no sense to me at all.

11 Q And you know that Troy German did not sign any  
12 document?

13 A I learned that after the fact when I talked to  
14 General Hunter.

15 Q Did General Hunter explain to you why that was  
16 the case? Why they hadn't insisted that?

17 A General Hunter told me he instructed them as a  
18 part of that to get that.

19 Q So your understanding is that the Attorney  
20 General's Office legal team did not do that at the direct  
21 odds of the instructions given by the Attorney General  
22 himself?

23 A I can't -- I can't answer that. They didn't  
24 get it. So I have no -- I don't know why.

25 Q Did Attorney General Hunter tell you they had

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1 dismissed that charge against Troy German because they  
2 believed he was innocent?

3 A No. Did not make that comment to me.

4 Q Did you talk about, with Attorney General  
5 Hunter, whether or not he believed Rusty Rhoades's  
6 allegation that Troy German blackmailed him?

7 A Not in that context, but it was very clear  
8 Mr. Hunter believed Rusty was a liar.

9 Q He believed Rusty was lying?

10 A Yes. Not in that case. I am talking in the  
11 context of why the case was dismissed. I didn't get into  
12 any details to the case itself.

13 Q You just got the impression that Mr. Hunter  
14 believed that Rusty did not have any credibility?

15 A No. Not based on that phone call I had with  
16 him.

17 Q So Mr. Hunter didn't trust in what Rusty was  
18 saying, in general?

19 MR. YAFFE: Object to form.

20 THE WITNESS: I can't answer it for Mr. Hunter.  
21 I don't know.

22 Q (By Mr. Bowers) Is there anything else you can  
23 remember from that conversation with General Hunter?

24 A No. I really can't, because it was a -- it was  
25 a 1776 moment for me.